

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

LAURA JEAN JOE-CRUZ,

Plaintiff,

v.

No. 1:16-cv-00258-JCH-WPL

UNITED STATES OF AMERICA,

Defendant.

AMENDED PLAINTIFF'S EXPERT WITNESS DISCLOSURE

COMES NOW Plaintiff, by and through his attorney, KEN WAGNER LAW, P.A. (Kenneth R. Wagner, Esq.) and hereby submits her expert witness disclosure as follows:

1. Michael Levine, M.D.
3032 Haddington Drive
Los Angeles, CA 90064

Dr. Levine will testify as to the breach of the standard of care of Plaintiff and the damages resulting thereof. It is anticipated he will further testify as to the necessity of medical services and the reasonableness of the medical bills.

Dr. Levine's report, and all other information required by Fed. R. Civ. P. 26(a)(2)(B) are being provided to all counsel under separate cover. Dr. Levine reserves the right to modify, amend or supplement his findings, as discovery is ongoing.

2. Richard H. Seligman, M.D., F.C.C.P.
8300 Constitution NE

Albuquerque, NM 87110

Dr. Seligman will testify as an expert in Pulmonology as to Acute Respiratory Distress Syndrome (“ARDS”), the symptoms, causes and risk factors, along with diagnosing, treating and recovering from ARDS. It is anticipated he will further testify as to the necessity of medical services and the reasonableness of the medical bills.

Dr. Seligman’s report, and all other information required by Fed. R. Civ. P. 26(a)(2)(B) are being provided to all counsel under separate cover. Dr. Seligman reserves the right to modify, amend or supplement his findings, as discovery is ongoing.

3. Joan Schofield, R.N., B.S.N., M.B.A., CNLCP
MedView
1400 Central S.E.
Suite 2000
Albuquerque, NM 87106

Ms. Schofield will testify as a life care planner for Plaintiff’s care and recovery from ARDS. It is anticipated she will further testify as to the necessity of medical services and the reasonableness of the medical bills.

Ms. Schofield does not currently have a written report. The report will be prepared upon further discovery, review of medical treatment and ongoing medical treatment. All other information required by Fed. R. Civ. P. 26(a)(2)(B) are being provided to all counsel under separate cover. Ms. Schofield reserves the right to modify, amend or supplement her findings, as discovery is ongoing.

4. William J. Patterson, III
Legal Economics
P.O. Box 25482
Albuquerque, NM 87125

Mr. Patterson will testify as to Plaintiff’s loss of earning capacity, loss of enjoyment of life, loss of household services and all other economic impacts on Plaintiff’s life.

Mr. Patterson is in the process of preparing his report. All other information required by Fed. R. Civ. P. 26(a)(2)(B) are being provided to all counsel under separate cover. Mr. Patterson reserves the right to modify, amend or supplement his findings, as discovery is ongoing.

5. Any expert listed by Defendant.
6. Any expert required as a rebuttal witness.

Respectfully submitted,

KEN WAGNER LAW, P.A.

/s/ *Kenneth R. Wagner*

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